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March 15, 2004

Mark H. Burak, Esquire  
Morse, Barnes-Brown & Pendleton, P.C.  
Reservoir Place, 1601 Trapelo Road  
Waltham, Ma 02451

W.R. Loftis, Jr., Esquire  
CONSTANGY, BROOKS & SMITH, LLC  
100 N. Cherry Street, Suite 300  
Winston-Salem, North Carolina 27101

Re: Michael Rodio v. R.J. Reynolds Tobacco Company  
No: 04 CV 10006 WGY

Dear Attorneys Burack and Loftis:

First, thank you for extending by thirty (30) days the Plaintiff's response to defendant's discovery.

I am herewith enclosing a copy of Plaintiff's Initial Disclosures pursuant to Fed.R.Civ.P. 26(a)(1) and Local Rule 26.2(A), the original of which is being retained by the plaintiff pursuant to Rule 5(d) of the Fed.R.Civ.P. The documents referred to in this disclosure are at my office and are available to you for your review and copying. I do not mind cataloguing and copying these numerous documents and forwarding them to you, but I will need much greater time to be able to do this. It may be easier if one of you came in or sent a paralegal to do this inspection and copying. I will, of course, leave that decision to you.

Very truly yours,

  
Michael S. Sahady

MSS/app  
Enclosures  
VIA FACSIMILE and FIRST CLASS MAIL